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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Re Patent Application of

Charles Coulier et al.

Application No.: 09/601,222

Filed: September 14, 2000

For: SYSTEM AND METHOD FOR  
MANAGING COMPUTER  
APPLICATIONS SECURITY

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) Group Art Unit: 2132  
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) Examiner: ZAND,KAMBIZ  
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) Confirmation No.: 8563  
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**REPLY BRIEF**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

This Reply Brief is being filed in response to the Examiner's Answer dated January 19, 2006.

At the outset, Appellants note, with appreciation, that the rejection of claims 1, 2 and 4 under 35 U.S.C. §112 has been withdrawn.

As pointed out in Appellants' main brief, the final rejection has not shown that either of the Proust or Jennings patents discloses "a number of security registers which are selectively allocatable to any one of a plurality of said directories," wherein the directories are organized in an n-level tree. In responding to the Appellants' arguments, the Examiner's Answer states "Examiner further has considered pointer to point to the location of the storage corresponds to Applicant's 'selectively allocatable'."<sup>1</sup> However, the Answer does not provide any support for this statement within the disclosure of the Proust patent.

<sup>1</sup> Examiner's Answer at page 10, second bulleted paragraph.

Referring to Figure 6 of the Proust patent, it illustrates that the remote application associated with address TP-OA 1 is associated with parameter set 62 in data storage 8. In a similar fashion, the application associated with address TP-OA 2 is associated with parameter set 61, and the application associated with address TP-OA 3 is associated with parameter set 63. According to Appellants' understanding of the rejection, the Examiner considers the respective areas where the parameter sets 61, 62 and 63 are stored in the data storage 8 to correspond to the claimed security registers. Each of the remote applications associated with the addresses TP-OA n points to one of these "registers", as represented by the arrows in the figure.

The Answer appears to be suggesting that the disclosure of these pointers teaches that the "registers" 61-63 are selectively allocatable. However, the Answer does not identify any portion of the disclosure of the Proust patent that supports this assertion. Figure 6 illustrates a one-to-one relationship between the addresses TP-OA n and the "registers" 61-63. The Answer has not identified any disclosure which suggests that the pointers do not point to the *same* parameter set at all times. There is no showing that the Proust patent discloses that these "registers" are selectively allocatable "to any one of a plurality of said [remote applications]," as recited in claim 1. For instance, Figure 6 illustrates that the remote application associated with address TP-OA 1 is associated with "register" 62. The Answer does not identify any disclosure that, at another time, the "register" 62 might be associated with the remote application at address TP-OA 2 or TP-OA 3.

There is nothing to suggest that the "registers" employ any form of allocation other than that which was known in the prior art, namely a separate security register

being dedicated to each application. The mere fact that the Proust patent discloses that the remote applications point to the parameter sets 61-63 does not inherently suggest that these parameter sets are selectively allocatable to any one of a plurality of remote applications.

In view of the foregoing, as well as the arguments presented in Appellants' main brief, the final Office Action does not establish a *prima facie* case of obviousness for the rejection of claims 1, 2 and 4. In particular, it has not shown that all of the elements recited in these claims are disclosed in the references being relied upon.

Reversal of the rejections is submitted to be in order.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Date: March 20, 2006

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